

GEORGE K. CHEBAT (034232)

George@EnaraLaw.com

JOSEPH J. TOBONI (031385)

Joseph@EnaraLaw.com

DANIEL DE JULIO (035854)

Danny@Enaralaw.com

Enara Law PLLC

7631 East Greenway Road, Suite B-2

Scottsdale, Arizona 85260

Filings@EnaraLaw.com

Telephone: (602) 687-2010

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti Corporation,
a Minnesota corporation; Stavatti
Immobiliare, Ltd, a Wyoming corporation;
Stavatti Industries, Ltd, a Wyoming
corporation; Stavatti Niagara, Ltd, a New
York corporation; Stavatti Super Fulcrum,
Ltd, a Wyoming corporation; Stavatti
Ukraine, a Ukrainian business entity; Stavatti
Heavy Industries Ltd, a Hawaii corporation;
Christopher Beskar and Maja Beskar,
husband and wife; Brian Colvin and Corrina
Colvin, husband and wife; John Simon and
Jean Simon, husband and wife; William
Mcewen and Patricia Mcewen, husband and
wife; Rudy Chacon and Jane Doe Chacon,
husband and wife; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: 2:23-CV-00226-PHX-DJH

**PLAINTIFF'S APPLICATION FOR
ENTRY OF DEFAULT AGAINST
DEFENDANTS STAVATTI
CORPORATION, CHRISTOPHER
BESKAR, PATRCIA MCEWEN,
WILLIAM MCEWEN, AND JEAN
SIMON**

1 Plaintiff Valentino Dimitrov (“Plaintiff”) requests the Clerk of Court enter default
2 against Defendants Stavatti Corporation, a Minnesota Corporation; Christopher Beskar;
3 Patricia Mcewen and William Mcewen, husband and wife; and Jean Simon (collectively,
4 “Defendants”) pursuant to Fed. R. Civ. P. 55(a).

5 In support of this request, Plaintiff relies on the record in this case and the affidavit
6 submitted as “**Exhibit A**”.

7
8 **RESPECTFULLY SUBMITTED** this 9th day of June 2023.

9
10 **ENARA LAW, PLLC**

11 By: /s/ George Chebat
12 George Chebat
13 Joseph J. Toboni
14 Daniel de Julio
15 *Attorneys for Plaintiff*
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of June 2023, copy of the foregoing was transmitted electronically to the CM/ECF filing system for filing and transmittal along with copies transmitted to all counsel of record via the CM/ECF system.

By: /s/ Shelly N. Witgen, ACP